



**Annual 47 C.F.R. Section 64.2009(e) CPNI Certification EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for 2018 covering the prior calendar year 2017.

Date Filed: March 1, 2018

Name of company covered by this certification: VSBX

Form 499 Filer ID: 831739

Name of signatory: Zachary R. Cluggish

Title of signatory: President

I, Zachary R. Cluggish, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. Section 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. Companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI, and what steps companies are taking to protect CPNI.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

The company represents and warrants that the above certification is consistent with 47 C.F.R.S. 1.17, which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signature Zach Cluggish

Date 3/1/18

Attachment: Accompanying Statement explaining CPNI procedures

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**Annual 47 C.F.R. Section 64.2009(e) Customer Proprietary Network Information (CPNI)**

**Operating Procedures Compliance Statement**

**EB Docket 06-36**

This Operating Procedures Compliance Statement for VSBX LLC (the "Company") explains how the Company's procedures ensure that the Company is in compliance with the requirements set forth in Section 64.200 1 *et seq* of the Commission's rules.

- A. Notice to customers of their right to restrict use of, disclosure of, and access to their CPNI is provided prior to solicitation for customer approval
- B. All Company employees will be trained annually on the Operating Procedures for properly safeguarding all CPNI. The Company holds occasional training sessions for employees reviewing when they are and are not authorized to use or disclose CPNI. The Company also sends, via company email or other methods the Company chooses to employ, information to employees relating to CPNI compliance.
- C. Every employee of the Company has a duty to protect the confidentiality of CPNI. A violation of the Company's operating procedures could result in disciplinary action.
- D. The Company maintains records of our own and our affiliates' sales and marketing endeavors that use customer CPNI, including instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI.
- E. The Company has established a review process for ensuring compliance with CPNI rules related to marketing activities. The Company's utilizes the Opt-out approval method to obtain approval for the use of CPNI information to market a second service category to individuals or businesses that are not already customers of that second service category. Customers who Opt-out are assigned a mail code to identify them as an Opt-out customer so that they are excluded from prohibited marketing activities.
- F. For safeguarding CPNI, the Company employs reasonable measures to discover and protect against attempts to gain unauthorized access to CPNI. Company employees follow procedures designed to authenticate all customers prior to disclosing CPNI based on customer-initiated telephone contact or in person visits.
- G. The Company will notify a customer immediately of account activity involving a change to an address of record.
- H. In establishing a password, the Company authenticates the customer without the use of readily available biographical information, or account information. The Company has a back-up plan in the event of a lost or forgotten password, however if a customer cannot provide the correct password or the correct response for the back-up authentication method, the customer must establish a new password.
- I. Should any breach of CPNI integrity be discovered, the Company will develop and maintain a record as to the date of the breach discovery, who discovered the breach, and the resulting notifications to the United States Secret Service and the Federal Bureau of Investigation no later than 7 days from the date of the discovery of the breach. The records of these discovered breaches will be maintained and held by the Company for no less than (3) years.



**Action taken by the Company against employees/data brokers for unauthorized release of CPNI**

There were no actions taken against anyone by the Company during the 2017 calendar year.

**Customer complaints received by the Company for un authorized release of CPNI**

No customer complaints concerning the unauthorized release of customer proprietary network information were received during the calendar year 2017.

Signed Zach Cluggish

Zachary R. Cluggish  
President  
VSBX

Date 3/1/18